

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY

**Caption in Compliance with D.N.J. LBR 9004-1(b)**

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In Re:

**LTL MANAGEMENT LLC**

Debtor.

Case No.: 23-12825 (MBK)

Chapter: 11

Judge: Honorable Michael B. Kaplan

**NOTICE OF APPEARANCE AND  
REQUEST FOR SERVICE OF NOTICES AND PAPERS**

Please take notice that in accordance with Fed. R. Bankr. P. 9010(b) the undersigned hereby enters an appearance in this case on behalf of Cyprus Amax Minerals Company (“CAMC”). Request is made that the documents filed in this case and identified below be served on the undersigned at this address:

**VINSON & ELKINS LLP**

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**DOCUMENTS:**

- All notices entered pursuant to Fed. R. Bankr. P. 2002.
- All documents and pleadings of any nature as described below.

**PLEASE TAKE FURTHER NOTICE** that, pursuant to section 1109(b) of the Bankruptcy Code and Bankruptcy Rule 3017(a), this request includes not only a request for service of the notices and papers referred to in the Bankruptcy Rules specified above, but also includes, without limitation, a request for service of all orders and notices of any application, motion, proposed order, petition, pleading, request, complaint, demand, memorandum, affidavit, declaration, presentment, order to show cause, disclosure

statement, and plan of reorganization, whether formal or informal, whether written or oral, and whether transmitted or conveyed by mail, courier service, hand-delivery, telephone, facsimile transmission, electronically, or otherwise, that is filed or given in connection with this case and the proceedings therein, including any that (1) affects or seeks to affect in any way rights or interests of any creditor or party in interest in these cases with respect to (a) the Debtor in the above-captioned case (the “Debtor”) and any related adversary proceedings, whether currently pending or later commenced, (b) property of the Debtor’s estate or proceeds thereof in which the Debtor may claim an interest, or (c) property or proceeds thereof in the possession, custody, or control of others that the Debtor may seek to use; or (2) requires or seeks to require any act or other conduct by a party in interest.

**PLEASE TAKE FURTHER NOTICE** that neither this Notice of Appearance nor any prior or subsequent appearance, pleading, claim, or suit is intended nor shall be deemed to waive the rights of CAMC: (1) to have an Article III judge adjudicate in the first instance any case, proceeding, matter, or controversy as to which a bankruptcy judge may not enter a final order or judgment consistent with Article III of the United States Constitution; (2) to have final orders in a non-core case, proceeding, matter, or controversy entered only after an opportunity to object to proposed findings of fact and conclusions of law and a de novo review by a district court judge; (3) to trial by jury in any case, proceeding, matter, or controversy so triable; (4) to have the reference withdrawn by the United States District Court in any case, proceeding, matter, or controversy subject to mandatory or discretionary withdrawal; or (5) any other rights, claims, actions, defenses, setoffs, or recoupments to which CAMC is or may be entitled under agreements, in law or in equity, all of which rights, claims, actions, defenses, setoffs, and recoupments expressly are hereby reserved. For the avoidance of doubt, filing this notice is not intended as, and shall not be, consent by CAMC to the entry of final orders and judgments in any case, proceeding, matter, or controversy if it is determined that the Court, absent consent of CAMC, cannot enter final orders or judgments consistent with Article III of the United States Constitution.

Date: May 24, 2023

/s/ Steven M. Abramowitz

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*Local Counsel for Cyprus Amax Minerals  
Company*